

1 DOWNEY BRAND LLP
JAMIE P. DREHER (Bar No. 209380)
2 SPENCER W. CHRISTENSEN (Bar No. 267154)
621 Capitol Mall, 18th Floor
3 Sacramento, CA 95814-4731
Telephone: (916) 444-1000
4 Facsimile: (916) 444-2100
jdreher@downeybrand.com
5 schristensen@downeybrand.com

6 Attorneys for Defendant
MEPCO FINANCE CORPORATION
7

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10

11 JACKIE L. HIGH, individually and on
Behalf of All Others Similarly Situated,

12 Plaintiff,

13 v.
14

15 THE CHOICE MANUFACTURING
COMPANY, INC., MEPCO FINANCE
CORPORATION, and DOES 3 through 20,
16 inclusive,

17 Defendant.
18

Case No. CV 11 5478

**STIPULATION AND [PROPOSED]
ORDER CONTINUING CASE
MANAGEMENT CONFERENCE AND
THE PARTIES F.R.C.P. 26 OBLIGATIONS**
19

20 WHEREAS, on November 10, 2011, plaintiff Jackie L. High (“Plaintiff”) filed a
complaint against The Choice Manufacturing Company, Inc. (“Choice”) and MEPCO Finance
21 Corporation (“MEPCO”) captioned *High v. The Choice Manufacturing Company, Inc., et al.*,
Case No. CV-11-05478-LB;
22

23 WHEREAS on December 15, 2011, Plaintiff filed an Amended Complaint pursuant to
Federal Rule of Civil Procedure 15(a);
24

25 WHEREAS the Parties previously stipulated to continue the deadline for Defendants to
answer the Amended Complaint to February 17, 2012;
26

27 WHEREAS on February 17, 2012, MEPCO filed a motion to dismiss the Amended
Complaint pursuant to Federal Rules of Civil Procedure 8(a), 9(b) and 12(b)(6) (“Motion to
28

Dismiss"). The Motion to Dismiss is set for hearing on April 6, 2012 in front of the Honorable Edward M. Chen.

WHEREAS Plaintiff and MEPCO have agreed that the currently scheduled case management conference, which is set for March 2, 2012, should be continued to a date after the hearing on the Motion to Dismiss pending the Court's ruling thereon. The purpose of the agreement to continue the case management conference is to make the process more efficient as the parties will have more information to report to the Court at that time. Accordingly, Plaintiff and MEPCO hereby stipulate to continue the case management conference to April 27, 2012 at 9:00 a.m.

WHEREAS Plaintiff and MEPCO have further agreed to continue the deadlines for their mutual obligations under Federal Rule of Civil Procedure 26, including the obligations to meet and confer, to file a joint status conference and make their initial disclosures to coincide with the date of the new case management conference. Accordingly, Plaintiff and MEPCO hereby stipulate to continue the:

(1) The deadline to meet and confer pursuant to F.R.C.P. 26(f) to April 6, 2012;

(2) The deadline to file a joint case management statement pursuant to Civil Standing Order 6 to April 20, 2012;

(3) The deadline to make initial disclosures pursuant to F.R.C.P. 26(a)(1)(C) to April 20, 2013.

///

///

///

///

///

///

///

///

///

1 IT IS ACCORDINGLY STIPULATED, by and between undersigned counsel for the
2 parties, that the Case Management Conference be continued to April 27, 2012 at 9:00 a.m.; that
3 the deadline to meet and confer pursuant to F.R.C.P. 26(f) be continued to April 6, 2012; that the
4 deadline to file a joint case management statement be continued to April 20, 2012; and that the
5 deadline to make initial disclosures pursuant to F.R.C.P. 26(a)(1)(C) also be continued to April
6 20, 2013.

7
8 DATED: February 21, 2012

DOWNEY BRAND LLP

9
10 By: /s/ Spencer W. Christensen
11 SPENCER W. CHRISTENSEN
12 Attorney for Defendant
MEPCO FINANCE CORPORATION

13 DATED: February 21, 2012

THE MEHDI FIRM

14
15 By: /s/ Azra Mehdi
16 AZRA MEHDI
17 Attorney for Plaintiff
JACKIE L. HIGH, individually
and on Behalf of All Others Similarly Situated

18 Pursuant to General Order No. 45 Section X(B), all signatories concur in filing this stipulation.

19
20 Dated: February 21, 2012

By: /s/ Spencer W. Christensen

21
22
23 ~~[PROPOSED]~~ ORDER

24 PURSUANT TO STIPULATION, IT IS SO ORDERD

25 Dated: 2/22/12

26 THE HON

